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**UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA**

DEANDRE MOORE, JR., an individual,

Plaintiff(s),

vs.

OVERTIME SPORTS, INC., a domestic
corporation; DOE EMPLOYEE, an individual;
DOES II through X; and ROE
CORPORATIONS I through X, inclusive,

Defendant(s).

Case No. 2:24-cv-01103-JAD-BNW

**JOINT DISCOVERY PLAN AND
SCHEDULING ORDER [SUBMITTED IN
COMPLIANCE WITH L.R. 16-1(B)]**

Plaintiff, DEANDRE MOORE, JR. ("Plaintiff"), by and through his counsel of record
William A. Gonzales, Esq. and Stephen G. Clough, Esq., of MAIER GUTIERREZ & ASSOCIATES,
and Defendant, OVERTIME SPORTS, INC. ("Defendant"), by and through its counsel of record,
Colt D. Dodrill, Esq., of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, hereby submit
this Proposed Joint Discovery Plan and Scheduling Order.

FED. R. CIV. P. 26(F) CONFERENCE

The parties participated in the FRCP 26(f) conference on June 26, 2024. Defendant
indicated it would be filing a Motion for Summary Judgment (ECF 9.) and moving to stay
discovery (ECF 10.). Plaintiff indicated it would oppose Defendant's Motion for Summary
Judgment (ECF 9.) and that discovery would be stayed if the Court found good cause to do so.

DISPUTED ISSUES

A dispute exists as to the discovery dates as follows:

DEFENDANT'S VIEW:

Discovery should be stayed pending the court's decision on Defendant's Motion for Summary Judgment (ECF 9.). Supplemental Fed. R. Civ. P. 26(f) conference to be held in the event the court denies that motion to discuss appropriate discovery deadlines.

PLAINTIFF'S VIEW:

1. Discovery Cut-Off Date: Discovery to close December 23, 2024 - 180 days from the date of the Fed. R. Civ. P. 26 discovery conference.

2. Amending the Pleadings and Adding Parties: September 24, 2024 - 90 days prior to the proposed close of discovery.

3. Fed.R.Civ.P.26(a)(2) Disclosures (Experts): Initial experts due October 24, 2024 - 60 days before the proposed discovery cut-off date; rebuttal experts due November 25, 2024 - 31 days after the initial disclosure of experts.

4. Interim Status Report: Under recent changes in the rules, the parties will not file an interim status report previously required by LR 26-3.

5. Dispositive Motions: due November 25, 2024 - 30 days after the proposed discovery cut-off date.

6. Pretrial Order: due December 27, 2024 - 32 days after the deadline to file dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court. In the further event that the discovery period is extended from the discovery cut-off date set forth in this Discovery Plan and Scheduling Order, the date for filing the joint pretrial order shall be extended in accordance with the time periods set forth in this paragraph.

7. Fed.R.Civ.P.26(a)(3) Disclosures: The disclosures required by Fed. R. Civ. P. (a)(3), and any objections thereto, shall be included in the joint pretrial order.

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UNDISPUTED ISSUES

1. Alternative Dispute Resolution: Counsel for the parties certify that they met and conferred about the possibility of using alternative dispute resolution including mediation, arbitration and/or an early neutral evaluation. The parties and their counsel believe that it is still necessary to conduct some discovery before attempting to resolve this case.

2. Alternative Forms of Case Disposition: The parties certify that they discussed consenting to trial by a magistrate judge or engaging in the Short Trial Program under Fed. R. Civ. P., and at present do not consent to either alternative form of case disposition.

3. Electronic Evidence: The parties certify that they have discussed and intend to use electronic evidence at the trial of this matter and will ensure that said evidence is in an electronic format compatible with the Court's electronic jury evidence display system. At present, the parties have not agreed upon any stipulations regarding use of electronic evidence but will address this issue again in the Pre Trial Order.

4. Extensions of Modifications of the Discovery Plan and Scheduling Order: Any stipulation or motion must be made no later than 21 days before the subject deadline. Requests to extend discovery deadlines must comply fully with L.R. 26-3.

Respectfully submitted this 9th day of July 2024.

MAIER GUTIERREZ & ASSOCIATES

By: /s/ William A. Gonzales

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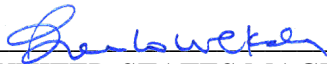
**WILSON, ELSER, MOSKOWITZ EDELMAN
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By: /s/ Colt D. Dodrill

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED: 7/11/2024